

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, et al.,)
)
Plaintiffs,)
)
v.) **1:12-cv-800-WTL-TAB**
)
J. BRADLEY KING, et al.,)
)
Defendants.)

MOTION FOR INITIAL ENLARGEMENT OF TIME

Defendants, J. Bradley King, in his official capacity as Co-Director of the Indiana Election Division, Trent Deckard, in his official capacity as Co-Director of the Indiana Election Commission and Connie Lawson, in her official capacity as Secretary of State, by counsel, Jefferson S. Garn, Deputy Attorney General, pursuant to S.D.Ind. L.R. 6.1(a), hereby move for an initial 28-day extension of time to respond to the Plaintiffs' Complaint, and in support states as follows:

1. The Complaint was filed on June 11, 2012, in this Court.
2. Accordingly the deadline for Defendants to answer or otherwise respond to the Complaint would be July 5, 2012, the first workday following July 4, 2012. That deadline has not passed.
3. Defendants respectfully request an initial 28-day initial extension within which to respond to the Complaint.
4. Undersigned counsel was assigned to represent Defendants in this matter on or about June 14, 2012, and requires additional time to consult with clients, which include multiple state agencies, and to prepare a response.

5. Undersigned counsel contacted Plaintiffs' counsel, Christopher Fedeli on June 28, 2012. Mr. Fedeli gave his consent for a fourteen day extension but objected to an initial twenty eight day initial extension of time.
6. This motion is Defendants' first request for an enlargement of time and is made of necessity and not interposed for delay.

Pursuant to S.D.Ind. L.R. 6.1(a), the Defendants' respectfully request the Court to grant their motion for an initial twenty-eight day extension of time to respond to the Complaint to and including August 2, 2012.

Respectfully submitted,

GREGORY F. ZOELLER
Indiana Attorney General
Attorney No. 1958-98

By: /s/ Jefferson S. Garn
Jefferson S. Garn
Deputy Attorney General
Attorney No. 29921-49

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of July, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the following counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jefferson S. Garn
Jefferson S. Garn
Deputy Attorney General

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